

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Teng Moua, Juan Martinez, Cheri Martinez, Kua Vang Xiong, Maiku Thao, Cherpa Yang, Bee Vang, Vang Pao Moua, Mailou Xiong Yang, Vangxue Yang, Eng Thao, Choua Moua, Meshack Balira, Ferdinand Nyambarya, VMS Inc., Richard Chang, Lee Wong Chang, Khonekham Dejvongsa, Noupheet Dejvongsa, Diego Cortez Dominguez, Mohamud Egal, Mohamed Osable, Hussein Osable, Ifran Jimale, Layla Jimale, Mohamed Jimale, Paul Bel George, Chue Hang, Tong Thao Hang, Rexhep Krasniqi, Tou Lor, Mai Moua Vue, Arif Metushi, Wa Her Moua, Mee Yang, John Schroeder, Judy Schroeder, Berhane Tesfai, Dual Cykao Thao, Xong Thao Yang, Kou Thao, Yang Xiong, Kevin Vilavong, Chong Xiong, Ko S. Xiong, Blia Yang, Ying Cheng, Chang Yang, Choua Lor, Mai Blia Yang, Pang Yang, Lue Her, for themselves and all other persons similarly situated as franchisees of Jani-King of Minnesota, Inc. and Jani-King International, Inc.,

No. 08-CV-04942 (ADM/JSM)

Plaintiffs,

v.

Jani-King of Minnesota, Inc., a Texas Corporation, Jani-King International, Inc., a Texas Corporation, George Selman, a Minnesota resident, and Steve Schmidt, a Minnesota resident,

Defendants.

DECLARATION OF CHRISTOPHER GRECIAN

I, Christopher Grecian declare as follows:

1. I am an attorney for plaintiffs and make this declaration in connection with Plaintiffs' opposition to defendants' motion for summary judgment. I have personal knowledge of the facts stated herein.

2. Attached hereto as Exhibit 1 is a true and correct copy of the deposition transcript for George Selman. **CONFIDENTIAL**

3. Attached hereto as Exhibit 2 is a true and correct copy of the deposition transcript for Steven Schmidt. **CONFIDENTIAL**

4. Attached hereto as Exhibit 3 is a true and correct copy of a list of Jani King Franchisees. **CONFIDENTIAL**

5. Attached hereto as Exhibit 4 is a true and correct copy of Jani King's Policies and Procedures Manual **CONFIDENTIAL**

6. Attached hereto as Exhibit 5 is a true and correct copy of a map marked as Deposition Exhibit 1009. **CONFIDENTIAL**

7. Attached hereto as Exhibit 6 is a true and correct copy of Jani King's Weekly Business Fulfillment Report dated 9/20/05, Deposition Exhibit 1004.

CONFIDENTIAL

8. Attached hereto as Exhibit 7 is a true and correct copy of Cherpao Yang's Questionnaire dated 7/22/05 (deposition Exhibit 245). **CONFIDENTIAL**

9. Attached hereto as Exhibit 8 is a true and correct copy of Diego Cortes Dominguez's Franchisee Account History Sheet, Deposition Exhibit 90).

CONFIDENTIAL

10. Attached hereto as Exhibit 9 is a true and correct copy of a letter from Diego Cortes Dominguez to Jani King regarding Trailways Ponds.

CONFIDENTIAL

11. Attached hereto as Exhibit 10 is a true and correct copy of an email message from Trailways Pond to Jani King dated 2/19/07.

CONFIDENTIAL

12. Attached hereto as Exhibit 11 is a true and correct copy of a letter from Jani King to Apache Animal Hospital dated 7/13/05. **CONFIDENTIAL**

13. Attached hereto as Exhibit 12 is a true and correct copy of a letter from Apache Animal Hospital to Jani King dated 7/20/05. **CONFIDENTIAL**

14. Attached hereto as Exhibit 13 is a true and correct copy of a letter from Apache Animal Hospital to Jani King to dated 8/19/05. **CONFIDENTIAL**

15. Attached hereto as Exhibit 14 is a true and correct copy of a letter from Max Steininger, Inc. to Jani King dated 2/14/06. **CONFIDENTIAL**

16. Attached hereto as Exhibit 15 is a true and correct copy of an Account Exchange Transfer Request Form dated 7/24/06 for Diego Cortes Dominguez.

CONFIDENTIAL

17. Attached hereto as Exhibit 16 is a true and correct copy of Paul Bel George's Franchisee Account History Sheet, (Deposition Exhibit 402).

CONFIDENTIAL

18. Attached hereto as Exhibit 17 is a true and correct copy of a letter from Paul Bel George to Tom Shellinger (Jani King Operations Manager) dated 6/9/03, Deposition Exhibit 405.

19. Attached hereto as Exhibit 18 is a true and correct copy of the deposition transcript for George Von Brugger. **CONFIDENTIAL**

20. Attached hereto as Exhibit 19 is a true and correct copy of a letter from Jani King to Diego Cortes Dominguez dated April 23, 2007, Deposition Exhibit 91. **CONFIDENTIAL**

21. Attached hereto as Exhibit 20 is a true and correct copy of a letter from Jani King to Diego Cortes Dominguez dated April 12, 2007, Deposition Exhibit 92. **CONFIDENTIAL**

22. Attached hereto as Exhibit 21 is a true and correct copy of *Randall v. Lady of America Franchise Corp*, 2005 WL 2709641 (D.Minn.).

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief

Dated: June 9, 2011

s/ Christopher Grecian
Christopher Grecian